

**Seth L. Goldstein (SBN 176882)**  
**The Law Offices of Seth L. Goldstein**  
**2100 Garden Road, Suite H-8**  
**Monterey, CA 93940**

Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA**

LOUISE ANDRES MARQUES, GLORIA  
V.M., THOMAS V.M., AND JORDAN V.M.,

Plaintiffs,

v.

GUIDING HANDS SCHOOL, INC., ET AL.,

Defendants.

Case No.: 2:22-cv-00150-DJC-CSK

**STIPULATION TO EXTEND  
RESPONSE TIME TO THE COURT'S  
MEET AND CONFER ON MOTIONS,  
STATUS REPORT AND ORDER**

Louis Andres Marques, et al., Plaintiffs, and Guiding Hands School, Inc., et al., Defendants, (collectively, the "Parties"), by and through their undersigned counsel, stipulate and respectfully request that the Court extend the deadline to (1) complete the Court-ordered meet and confer regarding motions, and (2) file the joint status report.

1. On September 30, 2025, the Court directed the Parties to meet and confer on pending or anticipated motions and to file a joint status report by October 15, 2025.
2. The Parties have diligently worked toward compliance but require additional time due to Counsel for Plaintiff's unavailability due to pre-planned and scheduled vacation from October 4, 2025, through and including October 26, 2025.

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- 1 3. All Parties agree that good cause exists for a short extension so the meet-and-confer can  
2 be completed in good faith and a more complete, helpful joint status report can be  
3 submitted.
- 4 4. Accordingly, the Parties stipulate and request that the deadline to complete the meet and  
5 confer and to file the joint status report be extended from October 15, 2025, to November  
6 11, 2025.
- 7 5. This is the Parties' first request to extend this deadline and is not intended to cause delay  
8 or prejudice.
- 9  
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11 Filer's Attestation Regarding Signatures:

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13 Pursuant to applicable rules permitting the use of electronic signatures, the undersigned filer  
14 attests that all other signatories listed below concur in the filing's content and have authorized the  
15 filer to affix their signatures to this stipulation.

16

17 **IT IS SO STIPULATED.**

18

19 **Dated:** 10/02/2025



20 \_\_\_\_\_  
Seth L. Goldstein, Counsel for Plaintiffs

21 **Dated:** 10/02/2025

22 \_\_\_\_\_  
Carol A. Wieckowski, by agreement

Carol A. Wieckowski, Counsel for Defendants

23 **Dated:** 10/02/2025

24 \_\_\_\_\_  
Daniela P. Stoutenberg, by agreement

Daniela P. Stoutenberg, Counsel for Defendants

25 **Dated:** 10/02/2025

26 \_\_\_\_\_  
Len Garfinkle, by agreement

Len Garfinkle, Counsel for Defendants

**ORDER**

Having considered the Parties' stipulation and finding good cause, IT IS ORDERED that the deadline to complete the meet-and-confer process and to file the joint status report is extended to November 11, 2025.

**IT IS SO ORDERED.**

Dated: October 2, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE